

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Tel. 415.268.7000 / Fax: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington, D.C. 20005
Tel. 202.237.2727 / Fax: 202.237.6131

WILLIAM C. CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SHAWN J. RABIN (*Pro Hac Vice*)
srabin@susmangodfrey.com
SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Fl.
New York, NY 10019
Tel. (212) 336-8330 / Fax: (212) 336-8340

Counsel for Defendants
UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION
TO WAYMO'S MOTION TO COMPEL
FURTHER 30(b)(6) TESTIMONY**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal portions of the briefing and certain exhibits to Uber’s Opposition to To Waymo’s Motion To Compel Further 30(B)(6) Testimony (“Opposition Letter Brief”). Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition Letter Brief	Highlighted Portions	Defendants
Exhibit 2	Highlighted Portions	Defendants
Exhibit 3	Highlighted Portions	Defendants

The blue-highlighted portions the Opposition Brief and the red, blue, and yellow-highlighted portions of Exhibits 2 and 3 contain confidential or highly confidential information regarding Uber’s LiDAR development and autonomous vehicle business strategy. This information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into Uber’s internal development of LiDAR, which would allow competitors to understand Uber’s LiDAR development and autonomous vehicle business strategy, and allow them to tailor their own strategy. If such information were made public, Uber’s competitive standing could be significantly harmed. (*See* Goodman Decl. ISO Uber’s Administrative Motion to File Documents Under Seal, ¶ 3.) Additionally, the highlighted portions of Exhibits 2 and 3 contain Uber employee names, the disclosure of which would threaten the privacy of individuals at a company that is currently the subject of extensive media coverage.

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo LLC with this Administrative Motion to File Documents Under Seal on August 26, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and

1 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –
2 ATTORNEYS’ EYES ONLY.”

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4 Dated: August 26, 2017

BOIES SCHILLER FLEXNER LLP

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6 By: /s/ Karen L. Dunn

Karen L. Dunn

7 *Counsel for Defendants*
8 UBER TECHNOLOGIES, INC. AND
9 OTTOMOTTO LLC
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